

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

Civil Action No. 2:16-cv-01326

JOSEPH ANDREW PAUL,  
JOHN D. ELLIS JR.,  
JAMES S. QUAY,  
a/k/a "STEPHEN JAMESON," and  
DONALD H. ELLISON

Defendants

**REQUEST FOR ENTRY OF DEFAULT**

Plaintiff, the Securities and Exchange Commission ("Commission"), hereby requests the Clerk to enter a default against Defendant Joseph Andrew Paul ("Paul") because, as set forth in the attached Declaration of Mark R. Sylvester, which is fully incorporated herein, Paul has failed to respond to the Complaint. After entry of default, the Commission intends to file a motion for default judgment, and supporting papers, under Rule 55(b)(2) of the Federal Rules of Civil Procedure.

Dated: August 7, 2017

Respectfully Submitted,

/s/ Mark R. Sylvester  
Mark R. Sylvester  
Counsel for Plaintiff  
SECURITIES AND EXCHANGE COMMISSION  
One Penn Center  
1617 JFK Blvd, Suite 520  
Philadelphia, PA 19103  
(215) 597-3100

**CERTIFICATE OF SERVICE**

I hereby certify, this 7th day of August, 2017, that I caused to be served a true and correct copy of Plaintiff Securities and Exchange Commission's Request for Entry of Default, and accompanying Declaration of Mark R. Sylvester in support thereof, through the Court's electronic filing system and by first-class mail upon the following parties:

Joseph Andrew Paul  
1 Franklin Town Blvd.  
Apt. 1906  
Philadelphia, PA 19103

John D. Ellis, Jr.  
241 Queen Street  
Philadelphia, PA 19147

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Philadelphia, PA 19107

**Counsel for Defendant Donald H. Ellison**

/s/ Mark R. Sylvester  
Mark R. Sylvester